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February 17, 2017

Mr. Thomas Rea
Mr. Michael A. Reilly
Assistant United States Attorneys
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102

Re: United States of America v. Anthony Jordan (3), et al.
Case No. S4-4:15CR00404 HEA (NAB)

Dear Tom and Mike:

Because Mr. Jordan is death eligible, Bill Lucco and I are requesting that you provide us with the following items of discovery, all of which are relevant and necessary for the preparation of our anticipated presentation before the Capital Review Committee:

- a. **Forensic Evidence.** Any and all reports, state or federal, pertaining to forensic evidence related to the homicides charged in Counts 5, 7, 8, 9, and 56, including ballistics tests, fingerprint comparisons, and DNA analysis;
- b. **Jailhouse Recordings.** Any and all audio recordings of Mr. Jordan's telephone calls made from any of the jails where he has been detained since his arrest on the original indictment;
- c. **Brady and Giglio Evidence.** Any and all investigative reports, state or federal, relating to cooperating witnesses, including their involvement in any homicides, including those charged in the fourth superseding indictment, or other violent acts as well as specific information as to any and all deals made with the government in exchange for their cooperation and/or testimony in this or any other case;
- d. **Victims' Criminal Activity.** Any and all investigative reports, state or federal, or information in the possession of government agencies that any of the victims of the homicides charged in Counts 5, 7, 8, 9, and 56 engaged in criminal activity that was related to the offenses charged in those counts;

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- e. **Additional Uncharged Homicides.** Any and all investigative reports, state or federal, pertaining to any other uncharged homicides or violent acts allegedly committed by Mr. Jordan that the government intends to include in its death penalty submission to the Capital Review Committee; and
- f. **Alleged Criminal Activity While Detained.** Any and all investigative reports, state or federal, relating to any criminal activity allegedly committed by Mr. Jordan during his confinement awaiting trial in this case.

Bill and I would like to meet with you and attempt to resolve these issues. Just let me know when you are available; however, given the government's anticipated death penalty submission, we would like to schedule the meeting by the end of next week.

Thank you for your courtesy and consideration.

Sincerely yours,

/s/Michael J. Gorla

MJG/ljp